CHAPTER 14 HAZARDS AND HAZARDOUS MATERIALS

This chapter presents the results of URS Corporation's (URS') evaluation of potential impacts related to hazardous materials for the DeWitt Government Center Facility Plan. A Phase I Environmental Site Assessment (ESA) was conducted for DeWitt Center, and documented in Chapter 3 of the *DeWitt Center Existing Conditions Report,* which is available for review at the office of the Placer County Department of Facility Services. The DeWitt Center Study Area consists of approximately 180 acres containing approximately 85 buildings and street addresses. Both building numbers and street addresses identify buildings on the site. The project area for this DEIR was included in the ESA, and was revisited by a URS representative in April 2003 to observe any changes in site usage or remedial activities since the preparation of the ESA. Interviews with knowledgeable County personnel were also conducted at that time.

14.1 SETTING

DeWitt Center was built between 1943 and 1945 as DeWitt General Hospital. It was one of the sixty-six general hospitals operated by the U.S. Army in the United States during World War II. DeWitt General Hospital treated patients from both the European and Pacific theaters of war during February 1944 through December 1945. After the war the hospital was sold to the state of California for use as a mental hospital. It served as such until 1971, when it was transferred to Placer County for use as county offices.

Location

DeWitt Center is located within a commercial/light industrial use area in unincorporated Placer County, north of the city of Auburn. Currently, the DeWitt Center Study Area is mostly developed with approximately 85 structures and is bound by Bell Road on the north and Atwood Road on the south. The western boundary of the study area is located on the west side of a former wastewater treatment plant and the eastern boundary is approximately the alignment of First Street. An abandoned water treatment facility and raw water retention basin are located on the eastern portion of DeWitt Center. That portion of the property is excluded from the DeWitt Center Study Area for this EIR. It is the subject of another EIR being prepared for the Placer County Planning Department. Adjacent parcels to the northeast and southeast are developed with single-family residences, and rural residential land uses exist to the west, northwest, and south. Commercial, office/professional, and light industrial development lies to the north and east.

The proposed project sites for the DeWitt Government Center Facility Plan are located throughout DeWitt Center on both developed and undeveloped land, as shown on *Figure 2-5* in **CHAPTER 2, PROJECT DESCRIPTION**. The proposed Land Development Building (LDB) site is located in the northwestern corner of DeWitt Center. Buildings 1 through 8 are located at this site and are proposed for demolition. Buildings 15 through 18, which are also proposed for demolitions, are located south of the LDB site, and the former wastewater treatment facilities that are proposed for demolition are located in the western portion of the Study Area. The other buildings proposed to be demolished are 204B, 205B, 206B, 207A&B, and 212A&B through 217A&B. These are located east and west of the central portion of DeWitt Center, between C Avenue and D Avenue. The proposed Auburn Justice Center (AJC) construction site is located west of Richardson Avenue adjacent to the Main Jail facility and the Juvenile Hall, while the

proposed Children's Emergency Shelter and Women's Center (CES and WC) projects are located in the southwestern corner of the Study Area.

Site Geology and Naturally Occurring Asbestos

DeWitt Center is located in the eastern portion of the Western Metamorphic Terrane, which consists predominantly of Jurassic igneous and sedimentary rocks of island-arc origin. The property is underlain by rocks known as the Smartville Complex, composed of mafic/intermediate volcanic and plutonic rocks. Naturally occurring asbestos can be associated with serpentine material known to be present in this portion of the foothills. Naturally occurring asbestos has been identified at nearby sites, including at a location on nearby Bell Road (Vintze pers. comm.).

Naturally occurring asbestos can be found in serpentine or its parent material, ultramafic rock. Serpentine is a mineral generally comprised of ferro-magnesian silicates characterized by long fibrous crystals, including asbestos. Rocks consisting of almost all serpentine minerals derived from the alteration of previously existing olivine and pyroxene are known as serpentinite. Ultramafic rocks include igneous rocks containing less than 45 percent silica, with virtually no quartz or feldspar, and are composed essentially of ferromagnesian silicates, metallic sulfides and oxides, and native metals. Due to the presence of the ferromagnesian silicates in ultramafic rock, there is the potential, depending on the degree of alteration of the ultramafic rocks to have asbestos occurring naturally in the rock underlying portions of the DeWitt Center Study Area.

Phase I Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was completed for DeWitt Center by URS using an Environmental Data Resources, Inc. report dated January 25, 2002. Information generated from previous environmental reports by Kleinfelder Incorporated, the U.S. Army Corps of Engineers (Corps) and their subcontractors was incorporated into the URS Phase I ESA as existing information and are summarized in the *Previous Reports* section below. The 2002 Phase I ESA was performed in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessment: Phase I Site Assessment Process E-1527-00. The 2002 Phase I ESA identified several Recognized Environmental Conditions (RECs) at the property associated with past site usage and underground storage tanks (USTs). By definition under ASTM designation E-1527-00, the term "Recognized Environmental Condition" means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include "*de minimis*" conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. The identified RECs that occur within or adjacent to the proposed project areas are discussed further below.

Federal and State Regulatory Agency Databases

URS reviewed information gathered from several environmental databases through Environmental Data Resources (EDR) to evaluate whether activities on or near the subject Study

Area have the potential to impact environmental conditions in the Study Area. EDR reviews databases compiled by federal, state, and local governmental agencies. The list of reviewed databases is summarized in *Table 14.1*. It should be noted that this information is reported as URS received it from EDR, which in turn reports information as it is provided in various government databases. Although the EDR information cannot be verified, the use of and reliance on this information is a generally accepted practice in the conduct of environmental due diligence studies.

Table 14.1
Environmental Agency Data

Agency Database	***Survey Distance***
United States Environmental Protection Agency (EPA) National Priority List and Proposed National Priority List (NPL) for Superfund Sites	1.5 mile
U.S. EPA Delisted NPL	1.0
U.S. EPA Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS) List	1.5 mile
U.S. EPA RCRA Permitted Treatment, Storage, and Disposal (TSD) Facilities	1.0 mile
U.S. EPA RCRA Permitted Treatment, Large Quantity Generator	0.75
U.S. EPA RCRA Permitted Treatment, Small Quantity Generator	0.75
U.S. EPA Comprehensive Environmental Response, Compensation and Liability Index System (CERCLIS) List	1.0 mile
U.S. EPA CERCLIS No Further Action (CERCLIS-NRAP)	0.75 mile
U.S. EPA Toxic Release Inventory (TRIS) List	Target Property
U.S. EPA Emergency Response Notification System (ERNS) List	0.50 mile
Superfund (CERCLA) Consent Decrees (CONSENT)	1.0 mile
Records of Decision (ROD)	1.0 mile
U.S. EPA Federal Superfund Liens (NPL Liens)	Target Property
U.S. EPA Facility Index System/Facility Identification Initiative Program Summary Report (FINDS)	Target Property
U.S. Department of Transportation (DOT) Hazardous Materials Information Reporting System (CHMIRS)	Target Property
U.S. Nuclear Regulatory Commission (NRC) Material Licensing Tracking System (MLTS)	Target Property
U.S. Department of Labor, Mine Safety and Health Administration, Mine Master Index File (MINES)	0.25 mile
U.S. EPA PCB Activity Database System (PAD)	Target Property
U.S. EPA RCRA Administrative Tracking System (RAATS)	Target Property
U.S. EPA Toxic Substance Control Act (TSCA)	Target Property
U.S. EPA FIFRA/TSCA Tracking System – FIFRA (Federal Insecticide, Fungicide and Rodenticide Act) (FTTS)	Target Property
California Environmental Protection Agency (Cal-EPA) Annual Workplan Sites (AWP)	1.5 miles

Agency Database	Survey Distance
California Department of Toxic Substances Control (DTSC) Calsites Database (CAL-SITES)	1.5 miles
California Office of Emergency Services, California Hazardous Material Incident Report System (CHMIRS)	1.5 miles
California State Water Resources Control Board (SWRCB) Proposition 65 Records (NOTIFY 65)	1.5 miles
California Index of Properties with Hazardous Waste (CORTESE)	1.5 miles
California Toxic Pits Cleanup Facilities (TOXIC PITS)	1.5 miles
California SWRCB Leaking Underground Storage Tanks (LUST) List	1.0 mile
Active UST Facilities List (UST)	0.75 mile
California SWRCB Waste Management Unit Database (WMUSD/SWAT)	1.0 mile
California Department of Health Services Bond Expenditure Plan (CA BOND EXP. PLAN)	1.5 miles
California EPA Facility Inventory Database (CA FID UST)	0.75 mile
California SWRCB Hazardous Substance Storage Container Database (HIST UST)	0.75 mile
California DTSC Drycleaner Facilities (CLEANERS)	0.25 mile
California SWRCB Waste Discharge System (CA WDS)	Target Property
California EPA hazardous waste Information System (HAZNET)	0.25 mile
Placer County Health and Human Services, Master List of Facilities (PLACER CO. MS)	Target Property
California SWRCB Spills, Leaks, Investigation & Cleanup Cost Recovery Listing (CA SLIC)	0.25 mile
California SWRCB Aboveground Petroleum Storage Tank Facilities (AST)	Target Property

Previous Reports

Several previous environmental reports, technical reports, and letters pertaining to DeWitt Center were provided to URS. Of these documents, those providing information on historical use and hazardous materials at the property were reviewed for this report and are summarized briefly below:

- **United States Army Corps of Engineers, Draft Environmental Assessment (EA), 1994**

This document is titled "Draft Environmental Assessment for the Removal of Underground Fuel Storage Tanks and Associated Fuel Pipelines at DeWitt General Hospital," and proposes to sample and remove 12 designated USTs and their associated piping. It identifies the known UST locations, as well as four suspect UST locations, based on site reconnaissance. Two of the known USTs and one suspect UST were located within proposed project sites. One was located adjacent to the incinerator and wastewater treatment plant and the other was located adjacent to Building 8 in the proposed LDB site. One of the suspect USTs was located adjacent to Building 4, also in the proposed LDB site. The Draft EA concludes that there will be no significant impact on the surrounding environment from removing the identified USTs.

Portions of this report are included in Appendix C of the *DeWitt Center Existing Conditions Report* (NFA/URS 2002).

- **Remedial Constructors, Incorporated, (RCI) Closure Report (Final), 1996**

This report is titled "Removal of Containerized Hazardous Waste and/or Toxic Waste, DeWitt General Hospital, DeWitt Center, Auburn, California," and documents the removal of nine USTs and their associated piping from six locations on the subject property. These nine USTs include the two located in the proposed project sites (described above) that were removed. The report provides analytical data on the soil and groundwater sampling that was conducted in each of the UST excavations, and recommends that additional work be conducted to delineate the extent of soil and groundwater contamination at the site. Portions of this report are included in Appendix C of the *DeWitt Center Existing Conditions Report* (NFA/URS 2002).

- **Central Valley Regional Water Quality Control Board, No Further Action letters, 2001**

Dennis Salter of Placer County Division of Facility Services provided two letters from the Central Valley Regional Water Quality Control Board to URS. The first letter is dated June 25, 2001 and states that no further action is required for a LUST located at 11510 F Avenue, DeWitt Center. It describes remedial actions for a 10,000-gallon gasoline UST at this location that was removed in 1992. The second letter is dated September 28, 2001 and states that no further action is required for LUSTs located at 11428 F Avenue, DeWitt Center (Building 419). The letter does not describe the investigation or the remedial action, but indicates that more than one tank existed at the site.

- **Kleinfelder, Incorporated, Semi-Annual Groundwater Sampling Report, January 2003**

This report documents groundwater sampling activities for the Placer County Service Station, at 11448 F Avenue, DeWitt Center (Building 401). Groundwater sampling at the property occurs at five monitoring wells on a semi-annual basis. The latest analytical results showed concentrations of MTBE up to 110 micrograms per liter (µg/L) in two of the monitoring wells. All other analyses in all the other wells were below laboratory detection limits.

Site Reconnaissance and Interviews

URS representatives conducted site surveys of the entire DeWitt Center on January 31 and February 6, 2002 to observe and document the existing conditions of the property. A follow-up survey of the specific proposed project sites was conducted on April 9, 2003 in order to observe and document any changes in site usage and conditions since the initial site surveys were conducted. In addition, URS conducted a "drive-by" survey of the vicinity to observe and document the nature of neighboring properties. The following sections present a summary of the conditions observed and the information obtained.

For the initial and follow up surveys, Dennis Salter, of Placer County Department of Facility Services, was interviewed by Steve McKnight of URS. Mr. Salter arranged access to the sensitive areas on the site, such as the Main Jail facility and Juvenile Hall. Dan Hurlbut, a senior supervisor in the Building Maintenance Division, is in charge of hazardous materials management for the buildings managed by the Department of Facility Services. He was also

interviewed and provided information on hazardous materials use and storage at the subject property.

Existing Hazardous Materials and Wastes

The following section summarizes the existing hazardous materials and wastes that were documented as occurring within or adjacent to proposed project sites.

Most buildings at DeWitt Center have janitorial closets or storage rooms that contain small quantities of cleaning supplies, including detergents, bleaches, and soaps, and occasionally pesticides. These materials and their quantities are not considered to present a material risk of harm to public health or the environment and would not be the subject of an enforcement action if brought to the attention of governmental agencies. Buildings and areas that contain hazardous substances and are specifically located within or directly adjacent to the proposed project sites are identified below.

Hazardous Substances

The Area in the Vicinity of Building 503. (This building was identified as Building 603 in the U.S. Army Corps of Engineers Draft EA. It is referred to as Building 503 throughout this DEIR.) This building was observed to be abandoned, and according to previous reports, was used as an incinerator when DeWitt Center was a hospital. This building and the adjacent abandoned wastewater treatment facility are proposed for demolition as part of the project. No hazardous materials were observed in the building. In the surrounding area, which is currently used as a storage yard for the Division of Parks and Grounds of the Department of Facility Services and the Department of Public Works, there were several areas used for hazardous materials storage. Nine lead-acid type batteries were observed in the grass near Building 503. Two metal storage tanks partially filled with rainwater and soil were observed immediately south of Building 503. Approximately thirty 55-gallon drums were observed in the storage yard near surface water drainage. The drums were empty and stored upside-down on gravel and grass. A separate 55-gallon drum labeled "Hazardous Waste" was observed on a pallet near a surface water drainage. The date on the label was faded and unreadable. Five empty storage tanks were observed west of Building 503; these were being stored on asphalt surface. Approximately 15 large roadwork vehicles and trailers were observed in the storage yard. It is unknown whether these vehicles and trailers still contained diesel fuel or other petroleum products.

Building 530. This building is the Juvenile Hall for Placer County and is adjacent to the proposed AJC site. Aside from janitorial closets, there is a flammable materials cabinet where approximately 20 gallons of paint are stored, and a small container for medical waste in the infirmary. Medical waste is taken to the Main Jail facility on a daily basis. The backup power generator for Juvenile Hall has a built-in diesel fuel tank that holds approximately 200 gallons of fuel. No staining or spills were observed in the vicinity of the generator.

Building 520. This building is the Main Jail facility for Placer County and is adjacent to the proposed AJC site. In addition to janitorial closets, this building has an infirmary, where medical waste is stored on a temporary basis, and a 450-gallon aboveground storage tank (AST) for diesel fuel. Medical waste for Juvenile Hall and the Main Jail facility is handled and disposed of by Steri-Cycle. The AST is the fuel supply for two backup electrical generators for

the building. No staining or evidence of spills was observed in the vicinity of the AST or the generators.

Building 8. This building is part of the Placer County Sheriff's office and contains a criminal evidence laboratory. This building is proposed for demolition since it is located within the proposed LDB site. The laboratory has a fume hood and a storage cabinet where a total of approximately 8 gallons of methanol and acetone were observed. According to the crime lab technician, no historical spills have occurred at this facility. Asphalt patch associated with the removal of a leaking underground storage tank (LUST) was observed outside, adjacent to this building. As shown in *Table 14.2*, this LUST was removed by the Corps in 1995.

Six other buildings located at DeWitt Center contain hazardous substances, but are not within or adjacent to proposed project sites. The six buildings are Building 210, Building 301, Building 305A, Building 308, Building 400, and Building 401.

Storage Tanks

As mentioned above, a 450-gallon diesel AST was observed at the Main Jail facility (Building 520) for the back-up generators at the jail. Eight other ASTs were identified on the DeWitt Center property but do not occur within or adjacent to the proposed project sites.

The *DeWitt Center Existing Conditions Report* (NFA/URS 2002) compiled the lists of known and suspected USTs at DeWitt Center from the previous Corps EA and the EDR report, discussed above. The EA identified 12 USTs and four suspected USTs at 12 locations throughout DeWitt Center (a location may contain more than one UST). The EDR report identified four confirmed additional UST locations at DeWitt Center. Of the 12 known and/or suspected UST sites, three sites occur within or adjacent to the proposed project area — at Building 4 (Bell Gardens), Building 8 (Sheriff's Office facility), and Building 503 (Water Treatment Plant). The Building 4 site is a suspected UST location. The information on these three sites is provided in *Table 14.2*.

Table 14.2
Status Summary of Known and Suspect USTs
List compiled from draft Environmental Assessment (EA)
U.S. Army Corps of Engineers 1994 and EDR report, 2003

Building Name	Bldg Number	Address	UST Size and Substance	UST Removed By	Current Status	Information Source
Bell Gardens	4	11422 A Avenue	Not Known	Not Known	Intact concrete pad observed	Corps EA, 1994
Placer County Sheriff's Office	8	1510 A Avenue	2,500-gallon diesel	Corps in 1995	RWQCB case open; contaminated soil in ground	Corps 1996 report
Water Treatment Plant	503 [603]	2900 B Avenue	900-gallon diesel	Corps in 1995	RWQCB case open; contaminated soil in ground	Corps 1996 report

Dumping

The Placer County Department of Environmental Health Services Division of Health and Human Services has been certified by the California Integrated Waste Management Board as the Local Enforcement Agency for solid waste issues in Placer County. The inventory of Placer County solid waste disposal sites maintained by the Local Enforcement Agency includes a site designated as the DeWitt State Hospital Disposal Site. While this site is assumed to be located at DeWitt Center, its exact location is unknown. Based on usage patterns at DeWitt Center, it is considered likely that the disposal site is in the western portion of the Study Area, possibly near the decommissioned WWTP and/or the proposed CES and WC sites. It is possible that hazardous materials could be found within the disposal site if it is encountered during grading, demolition, or construction.

According to Mr. Hurlbut, the area of the proposed CES and WC, west of the abandoned sewage pond, has historically been used as an unofficial dumpsite. During the site inspections, a large pile of tree stumps and piles of concrete and building debris were observed adjacent to the west side of the pond. A pile of plant waste was observed southwest of the pond. Concrete and building debris covered by grass were observed southwest of the sewage pond dam. Mr. Hurlbut said that some of the building debris came from previous demolition activities at DeWitt Center, but some of it had also come from offsite locations.

Pits, Ponds, Lagoons, Septic Systems, Cisterns, Sumps, and Drains

Aside from the upper open water pond, which was a part of the decommissioned wastewater treatment facility at the western end of the Study Area, two stormwater detention basins were observed in the vicinity of the Main Jail facility. An abandoned water treatment pond was observed on the adjacent property to the east. This pond is now drained.

Staining and Discolored Soils

In general, stained and discolored soils were not observed in the Study Area. Small patches of oil-stained ground were observed under some of the vehicles in the storage yard near Building 503, which is proposed for demolition.

Onsite Wells

Five monitoring wells were observed in the Study Area but not within or adjacent to any of the proposed project sites. These wells are used for quarterly monitoring of groundwater in the vicinity of Building 401, the Department of Public Works service station. No other groundwater monitoring wells, water supply wells, or gas and oil production wells are known to exist onsite.

Lead-based Paint and Asbestos

Although lead-based paint and asbestos are not included in the ASTM standard for ESAs, the buildings and structures observed in the proposed project sites at DeWitt Center are of the appropriate age and construction to contain asbestos containing materials and lead-based paint. Buildings and facilities proposed for demolition are likely to contain lead based paint and asbestos containing materials.

Regulatory Database Review

A new Environmental Data Resources, Inc. (EDR) report (April 2, 2003) was reviewed to identify potential environmental concerns such as environmental permits, incidents, complaints, violations, response actions, and remedial activities relating to owners and operators on the subject property, and on abutting and adjacent properties that may have occurred since the *DeWitt Center Existing Conditions Report* was prepared. URS reviewed federal and state agency records and databases and conducted a follow-up survey and interview on April 9, 2003. No significant changes in the listing in the EDR report occurred between the January 25, 2002 and April 2, 2003 reports. The follow-up survey and interview confirmed that no significant changes in the site condition occurred since the *DeWitt Center Existing Conditions Report* was prepared.

14.2 REGULATORY FRAMEWORK

As evident in the previous section, hazardous materials are regulated at the federal, state, and local level. These regulations address separate issues associated with hazardous materials and must be adhered to in order to comply with the requirements of different regulatory agencies. Federal and state standards often overlap in areas of hazardous waste management. However, if state standards prevail, they are typically as stringent or more stringent than the federal standards.

Applicable federal, state, and local laws governing hazardous materials during the demolition and construction phases of the project are discussed below.

Federal

The Clean Air Act requires the U.S. Environmental Protection Agency (U.S. EPA) to develop and enforce regulations to protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the Clean Air Act, the U.S. EPA established the National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. Asbestos was one of the first hazardous air pollutants regulated under Section 112. The U.S. EPA promulgated the Asbestos NESHAP in 40 CFR Part 61. Federal agencies often delegate responsibility to the local Air Quality Management District or Air Pollution Control District (APCD) to administer regulations. However, the Placer County APCD is not a federally delegated agency. Therefore, NESHAP compliance is the only compliance required for asbestos removal. Asbestos abatement activity notification is given to the U.S. EPA and the California Air Resources Board in Sacramento.

State

The Central Valley Regional Water Quality Control Board is part of the California Environmental Protection Agency (Cal-EPA). The Regional Water Quality Control Board has responsibility for groundwater quality in the Study Area and would address issues that could impact groundwater. As indicated previously, there are two open LUST cases administered by the Regional Water Quality Control Board in the proposed project areas (Building 8 and Building 503). The Corps is the primary responsible party for these cases, and therefore responsible for their remediation and closure. Consequently, there is the issue of potentially impacted soil and groundwater being present in the project areas where demolition and construction are planned. If the soil and groundwater needs to be removed from the project

areas during these activities, it will need to be sampled prior to disposal for characterization purposes.

On July 22, 2002, the state approved the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations (CCR Title 17, Section 93105). This measure requires the notification of the local air district of construction activities in areas where ultramafic rock, serpentine, or naturally occurring asbestos may be found. Construction activities in such areas require the approval and implementation of an Asbestos Dust Mitigation Plan.

Local

The California Health and Safety Code, Division 20, Chapter 6.11 allows the establishment of a local unified hazardous waste and materials management regulatory program. This allows for the establishment of a Certified Unified Program Agency (CUPA). In Placer County, this program is administered by the Placer County Department of Environmental Health Services, which was certified as a CUPA in 1997. As indicated in the *Placer County General Plan*, Policy 8.G.5, the County shall strictly regulate the storage of hazardous materials and waste. The Placer County Department of Environmental Health Services will be the agency that regulates hazardous materials for the proposed project. The *Placer County General Plan*, Policy 8.G.10 also indicates the County shall require that any business that handles a hazardous material prepare a plan for emergency response to a release or threatened release of a hazardous material. This information would be contained in a Hazardous Materials Business Plan required by the CUPA. The Hazardous Materials Business Plan would contain an inventory of the hazardous materials used and stored at the property, an emergency response plan, and training programs for employees in safety procedures and emergency response.

The Placer Consolidated Fire Protection District (PCFPD) provides fire protection and emergency services to Placer County. The PCFPD has requirements for the permitting of temporary aboveground storage tanks that may be used to store fuel(s) for machinery associated with construction activities for the project as well as other hazardous material(s) storage areas that may exist in the Study Area. Several County plans and documents contain goals and policies related to hazardous materials that are applicable to the proposed project.

Auburn/Bowman Community Plan

There are no goals and policies in *Auburn/Bowman Community Plan* that are applicable to the proposed development covered in the DeWitt Government Center Facility Plan with respect to hazardous materials.

Placer County General Plan

The Health and Safety Element of the *Placer County General Plan* contains the following policies regarding hazards and hazardous materials that are applicable to the proposed DeWitt Government Center Facility Plan.

Goal 8.D To minimize the risk of life, injury, damage to property, and economic and social dislocations resulting from airport hazards.

8.D.2 The County shall limit land uses in airport safety zones to those uses listed in the applicable airport comprehensive land use plans (CLUPs) as compatible

uses. Exceptions shall be made only as provided for in the CLUPs. Such uses shall also be regulated to ensure compatibility in terms of location, height, and noise.

Goal 8.G To minimize the risk of loss of life, injury, serious illness, damage to property, and economic and social dislocations resulting from the use, transport, treatment, and disposal of hazardous materials and hazardous materials wastes.

8.G.1 The County shall ensure that the use and disposal of hazardous materials in the County complies with local, State and federal safety standards.

8.G.2 The County shall discourage the development of residences or schools near known hazardous waste disposal or handling facilities.

8.G.3 The County shall review all proposed development projects that manufacture, use, or transport hazardous materials for compliance with the County's Hazardous Waste Management Plan (CHWMP).

8.G.9 The County shall require that applications for discretionary development projects that will generate hazardous wastes or utilize hazardous materials include detailed information on hazardous waste reduction, recycling, and storage.

8.G.10 The County shall require that any business that handles a hazardous material prepare a plan for emergency response to a release or threatened release of a hazardous material.

Goal 8.F To protect public health and safety through safe location of structures necessary for the protection of public safety and/or the provision of emergency services

8.F.1 The County shall not locate new County structures necessary for the protection of public safety and/or provision of emergency services in areas subject to inundation, subsidence, slope failure, surface rupture, or ground failure in a seismic event. Exception to this policy may be granted if the only alternative location would be so distant as to jeopardize the safety of the community, given that adequate precautions are taken to protect the facility.

8.F.2 The County shall, within its authority, ensure that emergency dispatch centers, emergency operations centers, communications systems, vital utilities, and other essential public facilities necessary for the continuity of government be designed in a manner that will allow them to remain operational during and following an earthquake or other disaster.

14.3 IMPACTS

Significance Criteria

The following significance criteria have been established for evaluating the significance or potential significance of a project-related hazardous materials or hazardous waste impact. Appendix G of the CEQA Guidelines identifies the following considerations for determining the level of impact related to hazards. A hazardous materials impact would be significant if any of

the following conditions would result from implementation of the proposed project, including demolition, construction, and operation phases:

- Creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emission of hazardous materials or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Creation of a significant hazard to the public or the environment due to the project site being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5;
- Creation of a safety hazard for people residing or working in the project area due to the project site being located within an airport land use plan or within the vicinity of a private airstrip;
- Impairment of implementation or physical interference with an adopted emergency response plan or emergency evacuation plan; or
- Exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Impacts Determined to be Less than Significant

Creation of a Safety Hazard Due to the Proximity of Any Airport or Airstrip. There are no private airstrips within two miles of the project site. The site is located within the jurisdiction of the Foothill Airport Land Use Compatibility Plan for the Auburn Municipal Airport. That airport is located approximately 7,000 feet northeast of the eastern boundary of the DeWitt Center Study Area. The majority of DeWitt Center is located in Compatibility Zone D, characterized by occasional aircraft overflights. The only land use restrictions in Zone D are related to hazards to flight, specifically structure height. As discussed in **CHAPTER 4, LAND USE AND HOUSING**, none of the proposed structures exceed the maximum allowable height in this location. The 160-foot communications tower proposed as part of the AJC does not exceed the allowable height at its proposed location. The proposed DeWitt Government Center Facility Plan does not result in any safety impacts related to the airport.

Interference with Emergency Response or Evacuation Plans. As stated in **CHAPTER 13, PUBLIC SERVICES**, there will not be a significant change to existing circulation patterns at DeWitt Center as a result of the proposed project. Adequate roadway access to all portions of DeWitt Center is provided via Richardson Drive and First Street; and fire equipment access to building interiors will meet Placer Consolidated Fire Protection District standards. No additional emergency access is needed. Therefore the proposed project is not expected to create any interference with emergency response or evacuation plans.

Exposure to a Significant Risk Related to Wildland Fires. As discussed in **CHAPTER 13, PUBLIC SERVICES**, no impacts to the provision of fire protection services are anticipated as a result of the

proposed project. This includes no significant increases in the risks related to wildland fires. The western portions of DeWitt Center support an oak woodland habitat, which is the nearest "wildland" area. A fire in this area could threaten the proposed CES and WC projects, as well as the existing Juvenile Hall and Main Jail facilities. As discussed in **CHAPTER 13, PUBLIC SERVICES**, the proposed CES and WC projects would include cleared zones within 30-feet of the buildings, fire retardant roofing and siding materials, and interior building sprinklers. These measures and the proximity of the local fire station will ensure that risks related to wildland fires are less than significant.

Potentially Significant Impacts

Impact 14.1 Creation of a Significant Hazard to the Public or the Environment Due to Transport, Use, Disposal, or Accidental Release of Hazardous Materials into the Environment and/or Within One-Quarter Mile of an Existing or Proposed School

Significance Before Mitigation:	Potentially Significant
Mitigation:	14.1a through 14.1e
Significance After Mitigation:	Less than Significant

Demolition Impacts. The proposed demolition of structures identified as containing asbestos-containing material and lead-based paint could contaminate portions of the demolition site surface with asbestos and lead and could release these hazardous materials into the air. Some of the existing structures in the project sites are of the appropriate age and construction to contain asbestos-containing materials and lead-based paint. Without appropriate controls during the demolition of these existing structures, there may be risk of exposure of people to asbestos and lead, a potentially significant impact.

Mitigation Measure 14.1a requires the preparation and implementation of an asbestos and lead-based paint abatement plan. Implementation of this measure would allow for the safe removal of asbestos and lead-based paint from the structures at the site prior to their demolition. The abatement plan would be based on a demolition level asbestos survey during which a thorough investigation and sampling program would be conducted to identify and quantify asbestos containing material present in a structure. A demolition-level lead-based paint survey would also be conducted to determine whether lead-based paint is present in structures proposed for demolition, and areas where abatement of lead-based paint would be required would be identified and quantified. This information would then be presented in an abatement plan for the structure(s) to be implemented by appropriately trained and qualified contractors. The abatement plan will identify the appropriate type of contractor to perform abatement and/or demolition. With implementation of *Mitigation Measure 14.1a*, the potential for exposure of people to asbestos and lead would be reduced to a less than significant level.

Soil contamination from an accidental spill of hazardous materials being stored or used at the site during construction. During construction, it is anticipated that hazardous materials such as fuels, oils, paints, and solvents would be used and stored throughout the Study Area. Depending on the volume of material(s) stored, the Placer Consolidated Fire Protection District could require the installation of temporary aboveground storage tanks (ASTs) to store fuels. Additionally, other temporary storage facilities such as construction offices and containers may be used in the

Study Area. The Placer Consolidated Fire Protection District requirements for temporary storage include safeguards such as spill prevention (such as the use of proper container types and storage requirements) and secondary containment for fuels and chemicals. Although these measures would reduce the potential for spills and releases in storage areas, there would be a potential for a release or releases to take place when the materials are being handled or used. Common releases include fuels being spilled during equipment fueling operations and hydraulic oils being released from leaking or severed hydraulic lines.

The preparation of a spill mitigation plan for construction activities, as described in *Mitigation Measure 14.1b*, would direct workers to implement prescribed mitigation measures to address a release of hazardous materials. Compliance with Placer Consolidated Fire Protection District requirements for storage of hazardous materials during construction and implementation of *Mitigation Measure 14.1b* would reduce construction impacts related to accidental spills of hazardous materials to a less than significant level.

Disturbance of soil containing naturally occurring asbestos during site grading and preparation. Although geotechnical investigations conducted at adjacent sites have not identified the presence of naturally occurring asbestos (serpentine) or other asbestos containing rock types, naturally occurring asbestos has been identified at nearby locations. For example, a site survey of a project on Bell Road did not reveal the presence of asbestos (serpentine) or other asbestos containing rock types. However, during construction, naturally occurring asbestos was identified in the field. Therefore, it is believed that naturally occurring asbestos (serpentine) or other asbestos containing rock types may potentially be discovered during grading and earthmoving in the proposed project sites. California Code of Regulations Section 93106 (Asbestos Airborne Toxic Control Measure – Asbestos Containing Serpentine) states if the concentration of asbestos in serpentine is greater than 5 percent, determined using California Air Resources Board Test Method 435, the material cannot be used as surfacing material. If the asbestos is naturally occurring it can be reused at the site for subgrade material that would be covered by other non–asbestos-containing material. However, the local regulatory agency should provide approval for the reuse of this material onsite. If approval is not given, the soil may require disposal as hazardous waste. The disturbance of naturally occurring asbestos-containing rock can potentially release asbestos into the air causing risk of exposure to people during grading and earthmoving activities. The preparation and implementation of an Asbestos Dust Mitigation Plan, as described in *Mitigation Measure 7.1a* and incorporated in this chapter by reference, will reduce the potential exposure to people during construction. Additionally, *Mitigation Measure 14.1c* stipulates the presence onsite of an experienced geologist or geotechnical engineer during site grading activities to identify potential asbestos containing rock materials. The geologist or geotechnical engineer shall identify and document any rock types requiring testing to determine the asbestos content to assess the suitability for material reuse as subgrade or surfacing material during construction. Implementation of *Mitigation Measure 14.1c* would reduce such impacts to less than significant levels.

Disposal of hazardous materials generated during demolition and construction. Debris generated by demolition and construction activities may include hazardous materials. For example, asbestos-containing material as discussed above, could be included in the demolition debris. Disposal of these materials elsewhere within DeWitt Center without designation of a disposal site through the California Integrated Waste Management Board would violate state law, and could lead to

continued release of hazardous materials throughout the Study Area. Implementation of *Mitigation Measure 14.1d* would ensure that all demolition and construction debris is disposed of properly.

Accidental release of hazardous materials during project operation. During operation of the forensic lab and evidence units of the Sheriff's department in the proposed AJC, small quantities of hazardous materials including, but not limited to, drugs, weapons, and laboratory chemicals would be stored at the site. Although the expected quantities stored onsite will be small, it is possible that some of the chemicals used and stored in the laboratory may be carcinogenic and hazardous. In that case, under the California Health and Safety Code, the lab would be required to maintain a Hazardous Materials Business Plan (HMBP) for the operation of the facility, as described in *Mitigation Measure 14.1e*. The HMBP would address handling of hazardous materials and potential releases of hazardous materials from the AJC site. The HMBP would include an inventory of all hazardous material and waste handled onsite, emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, and training for all employees in safety procedures in the event of a release or threatened release of a hazardous material. Mitigation of this impact would involve preparing a chemical inventory to submit to the Placer County Department of Environmental Health Services to determine if a HMBP is required.

Use, storage, transport, or accidental release of hazardous materials within one-quarter mile of an existing or proposed school. As discussed in this chapter, the proposed project does include the use, transport, and storage of small amounts of hazardous materials during project construction and operation. Therefore, the project carries the potential for accidental release of hazardous materials. As discussed in **CHAPTER 13, PUBLIC SERVICES**, there are a few school facilities onsite. Additionally, Rock Creek Elementary School is located northeast of the project area near the intersection of Bell Road at State Route 49, and Auburn Elementary School is located south of the area, at the intersection of Kemper Road at Bean Road. Both schools are approximately one-quarter of a mile from the project area. Accidental releases of hazardous materials during demolition, construction, and operation of the proposed project could expose the onsite and offsite school facilities to hazardous materials. Implementation of Mitiga*tion Measures 14.1a* through *14.1c* and *Mitigation Measure 14.1e* would minimize this potential impact to less than significant levels.

Impact 14.2 Creation of a Significant Hazard to the Public or the Environment Due to the Project Site Being Located on a Site Included on a List of Hazardous Materials Sites

Significance Before Mitigation:	Potentially Significant
Mitigation:	14.2a and 14.2b
Significance After Mitigation:	Less than Significant

Disturbance of soil containing hazardous materials during site grading and preparation. Since some of the project sites are known to currently contain building debris (CES and WC project sites) and soil contaminated with petroleum hydrocarbons from LUSTs (Building 8 within the LDB project area and in the vicinity of Building 503, which is part of the wastewater treatment plant demolition area), and it is known that an old disposal site exists somewhere within the Study Area, it is possible that soil in some of the project sites would be considered hazardous waste if

it were to be removed from the site. Identifying the existence and extent of impacted soils would reduce risk of exposure to people and allow for proper disposal of the material. Should the DeWitt State Hospital Disposal Site be found during demolition or construction activities associated with the proposed projects, remediation and closure of the disposal site pursuant to the requirements of applicable sections of Title 27 California Code of Regulations, Division 2, Chapters 3 and 4 would be necessary.

Preparation and implementation of a Soil Sampling and Analysis Plan would identify the existence and extent of impacted soil at the proposed project sites, outline areas where soil removed during grading would need to be stockpiled and sampled prior to its reuse or removal from the site, and aid in determining the location of the DeWitt State Hospital Disposal Site if it exists within one of the project sites. It is not expected that the disposal site would be found at the proposed LDB or AJC sites based on the results of the design-level geotechnical investigations conducted at each site (both geotechnical investigation reports are discussed in **CHAPTER 10, GEOLOGY, SOILS, AND SEISMICITY**, and are included in Appendix E of this EIR). Design-level geotechnical investigation of the CES and WC sites and submittal of a rough grading plan to the Department of Public Works for approval will be necessary prior issuance of a grading permit for the sites. The geotechnical investigation will include subsurface exploration capable of determining the likely presence or absence of this disposal site, as well as the Soil Sampling and Analysis required in *Mitigation Measure 14.2a*.

Additionally, *Mitigation Measure 14.2a* stipulates the presence of an onsite geologist or geotechnical engineer during site grading activities to sample soil potentially containing hazardous materials. The geologist or geotechnical engineer shall identify which analyses would be necessary to determine the suitability for material reuse as subgrade or surfacing material during construction and interpret the results of the analyses in regard to reuse and disposal options. Implementation of *Mitigation Measure 14.2a* would reduce this impact to a less than significant level.

Potential for investigation and remedial activities associated with the open LUST cases to impact the proposed LDB construction and water treatment plant demolition. Since there are open LUST cases at two of the proposed project sites, there is the potential that the Corps, the responsible party for these LUST cases, will conduct further investigation and remediation at the sites in order to achieve case closure. One of the LUST cases is located in the proposed parking lot of the LDB. The other open LUST case is located at the wastewater treatment plant. In order to avoid potential impact to the proposed construction and demolition at these sites, coordination of the construction and demolition activities by the County with the investigation and remedial activities of the Corps for these LUST cases will occur, as described in Mitigation Measure 14.2b. The Corps will be informed of the proposed construction activities and schedule so they may coordinate their site investigation and potential remedial activities for the LUST site in those areas. Although the LUST sites will still be accessible for investigation and remediation following project construction, it is the goal of this coordination for the investigation and remediation to be coincident with the proposed construction activities. Impacts related to the closure of these LUST cases regardless of the timing of completion of site investigation and remediation by the Corps are anticipated to be less than significant. No additional mitigation is necessary.

14.4 MITIGATION MEASURES

Creation of a Significant Hazard to the Public or the Environment Related to Transport, Use, Disposal, or Accidental Release of Hazardous Materials into the Environment and/or Within One-Quarter Mile of an Existing or Proposed School

Mitigation Measure 14.1a: Prepare and implement an asbestos and lead-based paint abatement workplan based on a demolition-level asbestos and lead-based paint survey for each demolition phase. The workplan(s) shall clearly identify the areas within the existing structures that contain asbestos and lead-based paint. The plan shall contain figures showing areas containing asbestos-containing materials, tables indicating the type and quantity of asbestos-containing materials, the method(s) to be used to abate the asbestos-containing materials, and a post-abatement certification sampling plan required to clear the facility for demolition. Additionally, the plan shall indicate the areas where lead-based paint abatement is required prior to demolition.

The asbestos abatement portion of the plan shall be prepared by a California State Certified Asbestos Consultant. All personnel conducting asbestos and lead-based paint abatement activities shall receive proper training and certification. U.S. EPA and the California Air Resources Board in Sacramento require a 10-day notification period prior to commencing any abatement activities.

Mitigation Measure 14.1b: Prepare and implement a Spill Mitigation Plan for construction-related activities. The Spill Mitigation Plan shall contain specific details on reporting requirements, cleanup process, appropriate use and storage (such as the use of proper container types and storage requirements), and waste containment and disposal. The plan will include specific measures and performance standards to ensure that appropriate measures are taken to adequately mitigate any releases so there are no subsequent impacts.

Mitigation Measure 14.1c: Implement *Mitigation Measure 7.1a,* which requires preparation and implementation of an Asbestos Dust Mitigation Plan and having a geologist or geotechnical engineer onsite during grading and earthmoving.

Mitigation Measure 14.1d: All debris generated during demolition and construction included in the DeWitt Government Center Facility Plan shall be recycled via an approved recycler or at an approved recycling facility to the extent feasible and/or be disposed of at an approved solid waste facility.

Mitigation Measure 14.1e: The County shall prepare a chemical inventory for each proposed new building to submit to the Placer County Department of Environmental Health Services to determine if a Hazardous Materials Business Plan is required. If a Hazardous Materials Business Plan is required, the plan shall address handling of hazardous materials and potential releases of hazardous materials from the site. It shall also include an inventory of all hazardous material and waste handled onsite, emergency response plans and procedures in the event of a reportable release or

threatened release of a hazardous material, and training for all employees in safety procedures in the event of a release or threatened release of a hazardous material.

It is possible that some of the chemicals used and stored in the laboratory and evidence units of the Sheriff's department in the proposed AJC may be carcinogenic and extremely hazardous. In that case, under the California Health and Safety Code, the lab would be required to maintain a Hazardous Materials Business Plan (HMBP) for the operation of the facility.

Creation of a Significant Hazard to the Public or the Environment Due to the Project Site Being Located on a Site Included on a List of Hazardous Materials Sites

Mitigation Measure 14.2a: Placer County shall prepare and implement Debris and Soil Sampling and Analysis Plans for the following project sites:

a. wastewater treatment plant demolition,

b. grading and construction at the Land Development Building site,

c. rough grading at the Children's Emergency Shelter and Women's Center sites, and

d. future construction at the Children's Emergency Shelter site.

Additionally, any public or private applicant for future construction of the Women's Center shall prepare and implement a Debris and Soil Sampling and Analysis Plan for that site during subsequent environmental review of that project.

The Debris and Soil Sampling and Analysis Plans shall require that Placer County and the Women's Center project conduct subsurface exploration at the Children's Emergency Shelter and Women's Center sites as part of preparation of site-specific design-level geotechnical investigations for both future projects. The Debris and Soil Sampling and Analysis Plans shall also require that each project proponent have a qualified geotechnical consultant onsite during grading and earthmoving at each of the identified project sites to monitor soil conditions at each site. The Plans shall be prepared and implemented to:

a. assess soil quality in the area of the LUST site within the wastewater treatment plant (Building 503),

b. determine the presence or absence of buried waste and or ashes that could indicate the presence of the listed DeWitt State Hospital Disposal Site as listed by the California Integrated Waste Management Board in the Children's Emergency Shelter and Women's Center sites,

c. identify the appropriate remediation procedures necessary should the DeWitt State Hospital Disposal Site be found at either the Children's Emergency Shelter site and the Women's Center site, and

d. assess soil quality in the area of existing above-ground building debris piles in the proposed Children's Emergency Shelter and Women's Center sites prior to any grading or construction at these sites.

The goals of the Debris and Soil Sampling and Analysis Plan (DSSAP) would be to identify the contents of the debris piles at the proposed CES and WC sites prior to disturbance of those sites, identify the existence and extent of impacted soil at the proposed sites for the LDB, wastewater treatment plant demolition, CES, and WC, identify the presence or absence of the DeWitt State Hospital Disposal Site, and outline areas where, if debris piles and/or soil were to be removed during grading, the materials would need to be stockpiled and sampled prior to its reuse or removal from the site. The DSSAP would identify potential contaminants in the debris piles and soil and a system of sampling locations that would adequately cover the area previously covered by building debris.

Mitigation Measure 14.2b: The County shall coordinate proposed demolition and construction phasing with the U.S. Army Corps of Engineers potential investigation and remedial activities associated with the open LUST cases onsite.

In order to avoid potential impacts to construction at the proposed LDB project site and wastewater treatment plant demolition site, the Corps shall be informed of the proposed construction activities and schedule so they may coordinate their site investigation and potential remedial activities for the LUST site in those areas. One LUST site (Building 8) is located in an area proposed to be a parking lot for the proposed LDB building. The other LUST site is located at the wastewater treatment plant. Although the LUST sites will still be accessible for investigation and remediation, it would be sensible and cost effective for the investigation and remediation to be coincident with the proposed construction activities.

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